



## ONESPAN INC. CORPORATE PRIVACY STATEMENT

### I. INTRODUCTION TO THIS PRIVACY STATEMENT

Protection of your Personal Data is important to OneSpan Inc. and its affiliated entities worldwide. OneSpan respects individual privacy and the protection of Personal Data and values the confidence of our customers, job applicants, employees, suppliers, contractors, business partners, and the public (all “**Data Subjects**”). That is why we strive to collect, use and disclose Personal Data in a manner consistent with the laws of the countries in which we do business. In particular, we seek to protect the data of Data Subjects, among others, against loss, leaks, errors, unauthorized access or unlawful processing.

This Corporate Privacy Statement (“**Statement**”) applies where OneSpan acts as a “controller”, i.e. determines the purposes and means of our processing for our own internal business purposes of Personal Data that we obtain through our Sites or Other Interactions, as defined below. This Statement describes the data privacy and protection practices of OneSpan as a controller in the collection, processing, use, storage, transfer, and disclosure of Personal Data. This Statement applies to the extent applicable and not prohibited under the Applicable Data Protection Laws in your jurisdiction. OneSpan conducts business globally and may reference regulations in this Statement that may not be applicable to your particular use or jurisdiction.

Please read this Statement and the Terms of Use before you continue browsing the Sites or participating in Other Interactions with OneSpan. If you disagree with OneSpan’s privacy practices, please do not access or use the Sites or participate in Other Interactions with us and do not transfer Personal Data to OneSpan. By accessing or otherwise using the Sites or participating in Other Interactions with us, you indicate that you have read this Statement and consent to its terms, unless such form of consent is prohibited in under the Applicable Data Protection Laws in your jurisdiction.

You are not obliged to disclose your Personal Data, but you understand that if you do not consent to its collection and processing by us, we will not be able to provide you with certain materials available on the Sites and our other websites or certain services, support or other assistance. You also understand are responsible for all Personal Data you provide to us and that we rely on its accuracy. If your Personal Data that you have provided to us is no longer up to date, please inform us immediately.

This Statement was last updated on the date set forth below. We may update this Statement from time to time to reflect changes to OneSpan’s processing of Personal Data. We encourage you to review this Statement on a regular basis and whenever you elect to provide personal information to OneSpan by visiting

<https://www.onespan.com/privacy-center> ("[Privacy Center](#)"). You will be notified of material revisions to this Statement electronically or by other means that OneSpan deems reasonably sufficient to reach your attention, such as a prominent post on the Sites or the Privacy Center.

## 2. KEY TERMS USED IN THIS PRIVACY STATEMENT

**"Applicable Data Protection Laws"** means Data Protection Laws that apply in a particular jurisdiction and/or to a particular type of data or use of data.

**"Cookie Technologies"** means passive data collection techniques such as web beacons, tags, various types of cookies and other similar tools, as further described in our [Cookie Statement](#).

**"Data Protection Laws"** means 1) the U.S. Data Protection Laws, 2) the GDPR and the laws of non-EU EEA countries that have formally adopted the GDPR, 3) Brazil's Lei General de Proteção de Dados Pessoais or 4) any other data protection laws applicable to OneSpan's processing of Personal Data.

**"Data Subjects"** mean OneSpan's customers, job applicants, employees, suppliers, contractors, business partners, and the general public.

**"EEA"** means the European Economic Area.

**"EU"** means the European Union.

**"GDPR"** means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (General Data Protection Regulation).

**"OneSpan"**, "we", "us", or "our" means OneSpan Inc. and its affiliated entities worldwide.

**"Other Interactions"** means various online and offline instances where Personal Data is obtained by OneSpan, other than through the Sites.

**"Personal Data"** means personal information and personally identifiable information, as such information may be defined under Applicable Data Protection Laws.

**"Portals"** means online community forums, chatrooms or portals owned or controlled by OneSpan, such as the developer portal, customer portal, partner portal, online training services and similar Sites.

**"Privacy Center"** means the OneSpan website available at <https://www.onespan.com/privacy-center> or an equivalent successor OneSpan website.

**"Sites"** means websites owned or controlled by OneSpan (including Portals) that link to or reference this Statement and where Personal Data is obtained by OneSpan.

**“Statement”** means this Corporate Privacy Statement.

**“Terms of Use”** means OneSpan’s website Terms of Use available at <https://www.onespan.com/terms-of-use>.

**“U.S. Data Protection Laws”** means all laws and regulations of the United States of America, including the California Consumer Privacy Act (CCPA), applicable to the processing of Personal Data.

## **Information Security**

OneSpan recognizes the importance of identifying and protecting the information assets of the organization, avoiding destruction, improper disclosure, improper modification or unauthorized use of any information relating to our customers, job applicants, employees, pricing, strategy, management, or other related concepts. We are therefore committed to developing, implementing, maintaining and continuously improving our information security management system in order to help ensure the confidentiality, availability and integrity of Personal Data and information in general. You can find more information about our information security program in our Privacy Center.

## **Error or Vulnerability Reports**

Despite the care we take to secure our systems, errors or vulnerabilities may happen. If you believe you have identified an error or a vulnerability, please let us know so we can address it. You can report errors and vulnerabilities to our security department: [security@onespan.com](mailto:security@onespan.com)

## **Cookies**

Cookie Technologies and controls are described in our [Cookie Statement](#).

## **3. WHAT’S IN SCOPE FOR THIS STATEMENT**

This Statement applies to Personal Data processed by OneSpan as a controller for our own internal business processes when you interact with OneSpan online, onsite or offsite, via the Sites, by downloading a whitepaper, subscribing to a newsletter, white paper or other marketing material, attending a webinar or tradeshow event, visiting our branded social media pages and other direct marketing interactions. OneSpan may collect Personal Data directly from yourself, via public sources or social media or from third parties. Our Sites may contain links to other websites and services which are outside OneSpan control and are not covered by this Statement. We recommend that you review the privacy statements of these other parties.

Personal Data processed in connection with a customer’s use of OneSpan products and services are subject to the Product Privacy Statement available at the [Privacy Center](#).

## **4. FROM WHOM DOES ONESPAN PROCESS PERSONAL DATA AS A CONTROLLER?**

OneSpan may collect Personal Data from the following Data Subjects:

#### *Customers*

Within the framework of our services and activities, we collect and process the professional identification and contact data of prospective/potential customers as well as our customers and clients, their staff, employees, appointees and other useful contacts.

The purposes of these processing operations are the execution of the agreements with our customers, customer management, contract and account management, executing the accounting, prospecting and direct marketing activities such as sending surveys, promotional or commercial information. The legal grounds are the execution of the agreement, the fulfilment of legal and regulatory obligations and/or our legitimate interest. The legal basis for prospecting and direct marketing is consent in jurisdictions where this is mandatory or, if permitted by the relevant Applicable Data Protection Laws, our legitimate interest in expanding our market share, increasing our customer base and publicizing our range of services. For marketing purposes, OneSpan identifies individuals by select criteria as having roles relevant to receive certain information regarding services and products and does not harvest email addresses using computer programs or by scraping websites for this information. Only relevant professional information is used, such as the name, title, address and telephone number of an individual that appears in a professional or business directory, listing or notice. OneSpan ensures that any such collection or use of Personal Data is done solely for a purpose that directly relates to the individual's professional activities, including their business, role and/or profession.

#### *Suppliers, contractors and business partners*

We collect and process the identity and contact details of our suppliers, outsourcing partners, service providers, advisors, brokers, agents, consultants, contractors and subcontractors, as well as of certain of their staff, employees, appointees and other useful contact persons. The purposes of these processing operations are the execution of the agreement with these parties and the fulfilment of legal and regulatory obligations such as the management of the contractual relationship, administration, assessments/audits, and financial and accounting matters. The legal grounds are the execution of the agreement, execution of payments, the fulfilment of legal and regulatory obligations and/or our legitimate interest (such as for direct marketing).

#### *Personnel*

We process the Personal Data of our employees as part of our personnel management and payroll administration. In view of its specific nature, this processing is regulated more comprehensively in an internal Employee Data Protection Statement.

#### *Candidates who apply for a job at OneSpan*

For our recruitment activities, OneSpan may ask you for certain information, including identification and contact details, information about your education and employment, contact details and preferences, professional qualifications and jobs for

which you wish to apply. You may also choose to provide OneSpan with additional information, such as your CV or diploma, employment references and related information, and compensation requests. In addition, OneSpan may collect information from third parties, based on your consent or on the basis of the consent you gave to such third parties such as temporary work agencies or recruitment agencies, for example in connection with a background check and/or an employment reference. Given its specific nature, this processing is regulated in more detail in the Talent Acquisition Privacy Statement on the Privacy Center.

### *Other Persons*

In addition to the Personal Data of customers, suppliers, contractors, business partners, job applicants and employees, we also process Personal Data of others, such as possible useful contacts within our sector, network contacts, contacts with government agencies, regulators, expert contacts, etc. The purposes of these processing operations are in the legitimate interest of our business, the execution of a contract or on the basis of a legal obligation. In addition, we also process Personal Data to comply with certain legal obligations. Finally, we may also process Personal Data when a person has given an unambiguous consent.

## **5. WHAT PERSONAL DATA DOES ONESPAN PROCESS AS A CONTROLLER?**

Depending on your activities and your relationship with OneSpan, you may provide us with certain Personal Data. When you use the Sites or participate in Other Interactions with OneSpan, OneSpan will process certain information including Personal Data in the connection with your use of the Sites or Other Interactions. Some information you provide directly to us, some we obtain by observing you interact with the Sites and some we obtain from public sources or from third parties. Personal Data processed by OneSpan will vary based on the Sites you interact with, the nature of your Other Interactions with us, the Personal Data you may elect to provide and what Personal Data is collected passively as you interact with the Sites.

OneSpan and our sub-processors may process Personal Data actively and passively. Active data processing is done for data that we request directly from a Data Subject. The Data Subject needs to actively provide this Personal Data. Passive data processing is done for data that is collected without asking the Data Subject for it. By way of example, this occurs when cookies on the Sites collect information about visitors to the Sites without the Data Subject activity inserting or otherwise providing data to the applicable Site. It may also refer to the passive processing of Personal Data without processing it in any other way other than receiving it, storing it or passing it on, without performing any analysis, modification or operation on it.

The Personal Data we process as a controller may include the following:

*Persons that contact or that have interactions with OneSpan through e-mail, telephone, at online webinars or other events, or in person (at events, trade fairs and other offline interactions):*

- Your name, professional information, such as business title and/or occupation, salutation, contact details such as telephone, mobile, or fax, email and/or postal address, username, password, photograph and/or biographical information,

social media profile, and/or areas of expertise when you: (i) communicate in person, electronically, by telephone, or in writing with any OneSpan employee or representative; (ii) apply or register for or attend any training, certification program, or event, webinar, or contest involving a OneSpan product, service, or promotional activity; (iii) subscribe to the OneSpan newsletter or download Site content; (iv) register for an online community that we host

- Your consent to OneSpan's processing of your Personal Data for the agreed purposes, if applicable
- Your consent to marketing permissions on the use of cookies and other data collection techniques

*Persons that use the Sites (including Portals):*

- Information about your device and your usage of the Sites
- Your registration information for, and information on your usage of, Portals that we host, such as the OneSpan customer portal for account management, the community portal, developer portal, partner portal, support portal or similar communities
- Unique IDs such as a cookie ID on your browser or geolocation data as well as information about your device, usage, mobile applications, websites or emails through Cookie Technologies, which may qualify as Personal Data
- Certain information from the browser you use, such as your IP address, device identifier, location data, browser type and language, access times, the Uniform Resource Locator (URL) of the website that referred you to our website and the URL to which you browse away from our site if you click on a link on our site
- OneSpan and third-party service providers of security monitoring, analytics and tracking technologies may gather Personal Data and other information using passive data collection techniques such as Cookie Technologies that provide OneSpan with Site activity data reflecting how you enter, navigate, and leave the Site pages you visit, the frequency of your visit and length of stay on any part of the Sites
- Certain Personal Data arising from security monitoring or SSL decryption of corporate firewalls, such as first name, last name/surname, email address, phone number, date of birth or any data submitted to the website

*Prospective customers or customers participating in demonstrations or trials*

- Biometric data or other Personal Data that you elect to submit to use for a product demonstration, testing, proof of concept or other agreed purposes may be processed. We refer to our [Global Biometric Privacy Notice](#) for this.

*Representatives of our customers*

- First name, last name
- Professional contact information (such as employer, job title, email address and telephone number)
- Employment information: employer, function title, address
- Involvement in incidents, complaints and problems in the execution of the contract or payments, as well as the content thereof
- All other information you share in your interaction with us for a certain business purpose

#### *Representatives of suppliers, contractors and business partners*

- First name, last name, professional contact information (such as employer, job title, email address and telephone number)
- For suppliers, contractors and business partners that are individuals: bank account number, bank name, account holder name, transactions/bank transfer, billing
- All other information you share in your interaction with us for the execution of the contract between us and for fulfillment of financial, accounting and legal obligations

#### *OneSpan personnel*

- All information required and permitted under applicable law to carry out the employment relationship and our legal obligations towards employees, payment of salaries/employee benefits and related administration and financial matters

#### *Persons who apply for a job at OneSpan or inquire about career opportunities*

- First name, last name, professional contact information (such as employer, job title, email address and telephone number)
- Education and employment
- Job preferences
- Professional qualifications
- Jobs you wish to apply for
- Résumé or curriculum vitae
- Diploma
- Employment references and related information
- Compensation expectations or requests
- If required for the function: result of background checks and screening
- All other information you share in your interaction with us during the application process and interviews for the job
- Your areas of interest or message topic
- Your language preferences

For more information on our recruitment activities, please refer to the Privacy Center for the Talent Acquisition Privacy Statement.

#### *Other persons*

- First name, last name, professional contact information such as employer, job title, email address and telephone number
- All other information you share in your interaction with us for the execution of the contract between us (if any) and for fulfillment of legal, financial, regulatory or other obligations

## **6. PARTICIPATION IN PORTALS**

When you participate in OneSpan Portals, such as the partner portal, which allow users to post messages for public comment, respond to comments or otherwise use the functionality of the portal to post information or interact with others, you are solely responsible for the Personal Data and content that you publish, and you



acknowledge that any Personal Data you volunteer will be accessible to and may be collected and used by the community of users in OneSpan forums or portals, depending on your account settings. OneSpan has no control over Personal Data and content that users share and publish in Portals. In some cases, such content may be publicly available on the Internet. When you publish in a Portal any Personal Data or content, you warrant and represent that you have the right to cause its publication, and you grant OneSpan a perpetual, royalty-free, worldwide license to use, transmit, display, copy, distribute, and exploit such content. OneSpan reserves the right to remove, in whole or in part, published content deemed offensive or inappropriate, and to disallow continued participation in Portals of the user responsible for such content.

## **7. HOW DOES ONESPAN COLLECT PERSONAL DATA?**

We collect personal data in variety of ways directly from you, including:

- When you communicate your personal data verbally or in writing to us;
- When you visit the Sites;
- When you create an account in a OneSpan Portal and use the functions or service provided through the Portal, directly or indirectly;
- When you participate in webinars, events, commercial promotions or marketing campaigns;
- When you participate in market research, surveys or other evaluation actions we launch;
- When you contact us via a webform;
- When you contact us via e-mail, chat(bot), social media or telephone; or
- When you participate in a demonstration, trial or specific project.

We collect Personal Data both when you give it to us verbally, when you send us documents and when you do it digitally, as well as when we look for it through public channels and professional social media (such as LinkedIn). In addition, we process your Personal Data to enable you to use the interactive applications and services on our Sites

We may also collect Personal Data from third parties and partners who can demonstrate that you gave them your consent to transfer your Personal Data to us.

When you contact OneSpan by telephone, this telephone call may be recorded. We record these telephone calls for educational, quality and security reasons. Only a limited number of employees in the customer service department have access to the recordings. Telephone recordings are automatically deleted after 30 days.

OneSpan may also collect other information which does not reveal your specific identity or does not directly relate to you as an individual, either through your interaction with us and/or with non-OneSpan websites. Other information may include, but is not limited to, browser and device information, data collected through automated electronic interactions, application usage data, demographic information, geographic or geo-location information, statistical and aggregated information. Statistical or aggregated information does not directly identify a specific person, but it may be derived from personal data.

## **8. HOW DOES ONESPAN USE THE PERSONAL DATA WE COLLECT?**



## **1. Business operations and service delivery.**

### *Website users and visitors*

- To allow access to downloadable materials and third-party resources
- To allow access and use of the Sites, including the Portals. With regard to demonstration experiences available via a Portal, refer to the Product Privacy Statement for information regarding Personal Data which may be shared with third parties in connection with performing a product demonstration
- To verify user compliance with the OneSpan Terms of Use
- To monitor your use of the Site and any apps and tools in our systems
- To enhance security and to protect OneSpan from fraud or other inappropriate conduct
- To provide other functions or serve other purposes, as disclosed to you at the point of collection or such other time or as required or permitted by law
- For SSL decryption of corporate firewalls to visualize and analyze, for monitoring purposes only, the encrypted traffic and screen for malicious data (viruses, spyware and malware) in order to prevent its download

### *Customers*

We use Personal Data to provide and improve our services and perform essential business operations for our customers. This is based on OneSpan's obligation to execute a contract it has with a customer.

- To provide OneSpan products, services, updating/patching, maintenance, support, troubleshooting, reporting, logging, technical support, and to resolve Site user problems as per the Product Privacy Statement
- To perform data analysis for product, service, and/or data protection or information security enhancement
- To develop aggregate analysis and business intelligence that enable OneSpan to operate, protect, make informed decisions, and report on the performance of our business and identify the services our customers want
- To improve the user experience for our services by analyzing user behavior and potential problems a user may encounter
- To test, improve, and develop products and services
- Service development and quality improvement and coaching and training of our personnel. Calls to our customer support department may be recorded and used for this purpose. We may evaluate your satisfaction and/or identify your wishes as a customer by asking you about your experience. We may evaluate the market and perform market research or trend analysis by involving our customers. You can participate in these efforts voluntarily. Where possible, we pseudonymize and aggregate Personal Data and will evaluate our projects in advance based on principles of privacy by design. The Data Protection Officer advises on and supervises these usages of Personal Data.
- To detect and prevent internal or external fraud and criminal activities
- To conduct aggregate analysis and business intelligence, which enables us to make informed business decisions (including profiling based on anonymized Personal Data which does not involve automatic decision making by our software applications for business analytics and reporting) and report on the performance of our business and our services

### *Suppliers, contractors and business partners*

We use Personal Data to receive supplies, services or works from suppliers, outsourcing partners, partners, resellers, service providers and subcontractors and to manage those parties as they execute their contract with us.

## **2. Contractual obligations.**

### *Customers*

When you enter into a contract with OneSpan, OneSpan will use your personal identification data and transactional data in order to:

- Provide you with the OneSpan services you contracted for
- Provide customer support, such as replying to your requests or inquiries, offering assistance, or handling a complaint
- Inform you and send you messages related to your contract with us and our services
- Send you analysis or reports as agreed in your contract
- Perform internal analytics and transaction reporting

### *Suppliers, contractors and business partners*

We use Personal Data to execute our contracts with suppliers, outsourcing partners, resellers, partners, service providers and subcontractors (including conducting communications, providing instructions, handling complaints, and attending to invoicing, payment and other matters).

### *Employees*

We use Personal Data to carry out our responsibilities and obligations as an employer, including payment of salaries and benefits and management of personnel.

## **3. Communications.**

### *Customers*

OneSpan collects Personal Data (1) to respond to requests or to perform a required activity; (2) to communicate news and updates on OneSpan products and services; (3) to enhance OneSpan's business programs and the relevance of OneSpan's marketing activities, product and service offerings; (4) to perform a contract; or (5) if you attend an event, we may, with your further consent, scan your attendee badge, which will provide to us your information, such as name, title, company name, address, country, phone number and email address.

Based on your consent or, in the absence of explicit consent, our legitimate interest to grow our customer base and market share, we use data we collect to deliver and personalize our communications with you via e-mail, SMS or social media. With regard to direct marketing, OneSpan might send you information about its services via personalized marketing messages (such as information or special offers) or generalized publicity and information. You can withdraw your consent to process your Personal Data for commercial communications by contacting our Data Protection Officer via [privacy@onespan.com](mailto:privacy@onespan.com). When you revoke your consent we will remove you from the mailing list as quickly as possible and within the deadlines specified by Applicable Data Protection Laws. You may still receive the

communications that were already scheduled before your request to unsubscribe. Any processing performed prior to your withdrawal remains a legitimate processing based on a valid consent at the time. OneSpan will not be under the obligation to reverse the processing.

We use your Personal Data to facilitate the delivery of OneSpan information, such as:

- to communicate with you and other users of the Sites, send OneSpan notifications and communication to users on current and new products or services and related news updates, programs or events
- to respond to inquiries, send administrative Personal Data and service notifications
- to allow participation in a survey, community discussion, blogs, chat forums, or message boards
- to tailor content and improve Site quality and user experience and notify users of changes or updates to the Sites
- to tailor marketing to users' and subscribers' needs
- to remarket and advertise to previous Site users
- to customize, measure, and enhance effectivity of promotional events and communications to customers
- to track marketing campaign results and responses
- link or combine information about you with other personal information we get from third parties, to provide the Sites, perform under our contract with you and provide our customers with better and more personalized products
- to communicate news and updates on OneSpan products, industry events, promotions, upcoming events, and news about products we offer or may be of interest to you, including promotional offers and surveys. You may opt-out of receiving emails regarding OneSpan events and various products by visiting our [Preference Center](#), however, you will continue to receive notices regarding OneSpan products you've purchased, and other communication related to your account

OneSpan may also disclose and transfer Personal Data to a third party in relation to any merger and acquisition or other similar activities.

#### *Suppliers, contractors and business partners*

We use Personal Data to communicate with suppliers, outsourcing partners, partners, resellers, service providers and subcontractors regarding the execution of the contract and new requirements for purchasing, tenders or assignments.

#### **4. Personnel management and recruitment.**

We use Personal Data from our personnel for our personnel management, the execution of the employment contract and compliance with our legal obligations as an employer. For candidates for recruitment, we collect to process online applications for job vacancies and spontaneous job applications, to communicate with you, to manage OneSpan's recruiting and hiring processes, and for compliance with legal and regulatory requirements. If you are hired, the information may be used in connection with employment and personnel management, including reporting on hiring analytics.

#### **5. Comply with legal and compliance obligations**

OneSpan may use Personal Data to comply with applicable laws, court orders and regulations, to protect the rights, property or safety of OneSpan, our customers, end users, employees or others and to operate our business.

#### *Customers*

OneSpan uses your Personal Data to comply with mandatory requirements imposed by Applicable Data Protection Laws. OneSpan legal obligations are, amongst others (this list is not limitative):

- To collect, verify and to store the personal identification and store transaction data of all of its counterparties. OneSpan is also obliged to transfer these data to the competent criminal, fiscal or other government authorities requesting counterparty's information and this without informing the data subject of such official request and the related data transfer
- Financial, accounting and administrative compliance

#### *Suppliers, contractors and business partners*

- Financial, accounting and administrative compliance

#### **Profiling of customers**

We confirm that the processing of Personal Data does not include profiling with the purpose of fully automated decisions.

OneSpan does not sell, rent, or allow your Personal Data to be used by third parties for their own marketing or other purposes.

## **9. WHAT IS OUR BASIS FOR PROCESSING INFORMATION ABOUT YOU?**

Where Applicable Data Protection Laws require a legal basis for the collection of Personal Data, OneSpan will collect and process your Personal Data on one or more of the following bases:

- when you give your explicit consent, such as when you apply for a job, create a user account, subscribe to a newsletter, access any OneSpan webcast, forum, information or materials from the Site, visit our branded social media pages, or use or access OneSpan services
- for compliance with OneSpan's legal obligations where other laws require the processing of your Personal Data (for example, health and safety, taxation, anti-money laundering laws, anti-corruption laws) or where we need your Personal Data to protect your vital interests or those of another person
- to communicate adequately with you and to respond to your requests, we need to process information about you and therefore have a legitimate interest in processing this information
- we rely on our legitimate interest to analyze, develop, improve and optimize our Sites, products and services, and to maintain the security of our Sites, networks and systems

- legitimate interests of OneSpan and our service providers, suppliers and sub-processors, which include the provision of the applicable products, provided always that our legitimate interests are not outweighed by harm your rights and interests
- OneSpan collects and processes your Personal Data and those of your representatives to the extent necessary to create the contract or to fulfill OneSpan's obligations under the contract with you or with the person or entity you represent, as well as for billing, reporting, or other legitimate business purposes
- Compliance with a legal obligation where OneSpan is required by law to process Personal Data for a particular purpose
- Legitimate interest where a customer or a representative of the customer, or in case of marketing actions for which OneSpan has a legitimate interest, OneSpan may process Personal Data obtained directly from you, via public sources or from third parties without your explicit consent if OneSpan has a genuine and legitimate reason, unless outweighed by harm to your rights and interests

## **10. WHY AND HOW WE SHARE PERSONAL DATA FOR BUSINESS PURPOSES**

### *Generally*

Your Personal Data are mainly processed internally. However, in order to execute a contract we have with you (or measures preceding the conclusion of the contract) or to fulfil certain legal obligations, they may sometimes need to be communicated to third parties.

For the purpose of processing your Personal Data, we grant access to your Personal Data to our employees, contractors and certain other service providers. We require our employees, contractors and service providers to agree to confidentiality and data privacy obligations designed to safeguard Personal Data. In order to provide adequate protection for the transfer of your Personal Data, where appropriate, OneSpan may share your Personal Data with other companies within the OneSpan group if required for the purposes described in this Statement. This may involve the transfer of your Personal Data to countries outside your home country or region (including outside the EEA if that is your region) which may have a different level of data protection from your home country. We have contractual arrangements in place (such as the European Commission's Standard Contractual Clauses as appropriate) among our parent company and affiliates and with our suppliers/sub processors in respect of such transfers.

We only transfer your Personal Data to third parties (recipients) if:

- you have given your explicit consent for one or more specific purposes pursuant to Art. 6(1) Paragraph 1(a) of the GDPR,
- disclosure is necessary for the assertion, exercise or defense of legal claims in accordance with Art. 6(1) para. 1(f) of the GDPR and there is no reason to assume that you have a primary, legitimate interest in the non-disclosure of your Personal Data,
- in case a legal obligation for disclosure exists according to Art. 6(1) Paragraph 1(c) of the GDPR and

- it is permitted by law and necessary for the fulfilment of contractual obligations in accordance with Art. 6(1) Paragraph 1 (b) of the GDPR.

Certain Personal Data collected by us will also be passed on to and possibly processed by third-party service providers, such as our hosting partners and IT suppliers, external partners assisting us with the support and further development of our IT tools, lawyers, data protection officers, and accountants, as well as by government or auditing authorities. These and other public authorities are entitled to request Personal Data from us to which we are legally obliged to respond in certain cases defined by law. In such cases, your Personal Data may be transmitted to these third parties but only for the purpose of the service in question.

The employees, managers and/or representatives of the above-mentioned service providers or institutions and the specialized service providers appointed by them are obligated to respect the confidential nature of your Personal Data and to use these data only for the purposes for which they were provided.

If necessary, your Personal Data may be passed on to other third parties. This may be the case, for example, if all or part of our business is reorganized, if our activities are transferred or if we are declared bankrupt. It is also possible that Personal Data may need to be transferred in response to a court order or to comply with a specific legal obligation. In this case, we will make reasonable efforts to inform you in advance of such communication to other third parties. However, you will acknowledge and understand that in certain circumstances, this may not be technically or commercially feasible, or that legal restrictions may apply.

#### *Customers*

We share your Personal Data in the event we have a legal obligation to do so, for instance to the regulatory or government bodies or agencies, or in case of legal proceedings, a court order or other mandatory legal injunction.

We may also share Personal Data with your consent or as necessary to complete any transaction or provide a service you have requested or authorized.

In addition, we share Personal Data among OneSpan affiliates and entities for our reporting, service delivery, business operations, direct marketing and communications.

We also share Personal Data with suppliers, outsourcing partners, service providers, processors or agents working on our behalf for the purposes described in this statement, including, for example (this list is not limitative):

- IT services companies
- Providers of cloud and hosting infrastructure and services
- Platform providers
- Marketing companies or market analysts
- Providers of services and tools to assure regulatory compliance
- Connectivity, telecommunication and internet providers
- Companies we have hired to provide customer service assistance
- Companies we have hired to assist in protecting and securing our systems and services
- Third-party service providers (for example, integrated technology partners who provide customer support, data analytics, information technology and related infrastructure provision, managed service providers, auditing, other similar



service providers,) for those service providers to perform business functions on behalf of OneSpan

- In individual instances, with professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in countries in which we operate (see list of relevant countries at <https://www.onespan.com/privacy-center>) who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Data
- Relevant third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)
- As required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes, provided if not otherwise prohibited, for third party notices specific to you, we notify you first and cooperate with you in any response to such third parties

We may also elect to share anonymous or pseudonymous usage data with OneSpan third parties, sub-processors and service providers for the purpose of helping OneSpan in such analysis and improvements. Additionally, OneSpan may share such anonymous or pseudonymous usage data on an aggregate basis in the normal course of operating our business; for example, we may share information publicly to show trends about the general use of our Sites.

We might also share data with third parties where the data has and has not been de-identified or aggregated in a way so it cannot be used to identify you or your end users. We might share Personal Data for marketing purposes with event organizers, marketing services providers and we may also receive Personal Data from such services providers for the organization of events, marketing actions or email/blast campaigns provided such services providers have a legal basis to transfer such Personal Data to OneSpan.

In such cases, these companies must abide by our data protection and security requirements and are not allowed to use Personal Data they receive from us for any other purpose.

Finally, we will access, transfer, disclose, and preserve Personal Data, including your content, when we believe that doing so is necessary to:

- comply with applicable law (for instance: financial, accounting and administrative compliance) or respond to valid legal process, including from law enforcement or other government agencies
- protect our customers, for example to prevent spam or attempts to defraud users of our services, or to help prevent the loss of life or serious injury of anyone
- operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks
- protect the rights or property of OneSpan, including enforcing the terms governing the use of the services – however, if we receive information indicating that someone is using our services to traffic in stolen intellectual or physical property of OneSpan, we



will not inspect a customer's private content ourselves, but we may refer the matter to law enforcement

Some of our services include links to services of third parties whose data protection practices differ from OneSpan. If you provide Personal Data to any of those services, your data is governed by their Data Protection Statements. In the event of a conflict between a OneSpan Data Protection Statement and the terms of any agreement(s) between a party and OneSpan, the terms of those agreement(s) will prevail.

#### *Suppliers, contractors and business partners*

We share only professional information if we have a legitimate interest or legal obligation to do so, including the following:

- comply with applicable law (for instance: financial, accounting and administrative compliance) or respond to valid legal process, including from law enforcement or other government agencies;
- organize and facilitate collaborations between suppliers, outsourcing partners, service providers and subcontractors or between those parties and third parties which are interfacing with or complementary to them; or
- protect the rights or property of OneSpan

## **I I. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We may retain your Personal Data for a period consistent with the original purpose of collection. We determine the appropriate retention period for Personal Data based on applicable legal requirements (such as applicable legal conservation periods or statutes of limitation). After expiry of the applicable retention periods, your Personal Data will be deleted. If there is any Personal Data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to restrict access and use of such Personal Data as required by applicable law. Website monitoring data are kept for 1 year or longer as per applicable legal requirements.

## **I 2. USER PROFILE, PREFERENCES, AND OPT-OUT**

To gain full access to certain areas of the Sites, download materials, or subscribe to or participate in certain OneSpan programs, OneSpan may require you to create a user account and maintain a user profile. You can opt-out of electronic communications by clicking the unsubscribe or opt-out link in OneSpan's marketing communication. You can control your preferences for using the Site including opting into or out of Personal Data for marketing use and certain programs and interests in your user account at [Preference Center](#) or by informing OneSpan at [privacy@onespan.com](mailto:privacy@onespan.com).

With your consent, your Personal Data will be added to OneSpan's internal mailing list so we can furnish you with information about our products and services and OneSpan offerings, events, webinars and other information via email, telemarketing, fax, SMS, and postal mail, as legally permitted. Also, OneSpan may disclose and transfer Personal Data to our marketing or other partners or resellers for the marketing of OneSpan products and services. If you no longer want to receive communications from OneSpan, you are free to withdraw your consent at any time via the Preference Center, however please note that withdrawal of your consent of processing Personal Data may render OneSpan unable to continue to provide access to certain Sites. If you withdraw your consent, it will not

affect the lawfulness of any processing based on your consent before you withdrew it. Some OneSpan Sites may require separate user registrations for you to obtain the services offered on those Sites. Certain OneSpan Sites will permit automatic access to other OneSpan Sites so that by logging into one user account, you may automatically be signed in to other OneSpan Sites. Other OneSpan Sites may have different purposes, uses, and data collection techniques than those indicated in this Statement. Please always review the privacy statement of the OneSpan Site that you access before providing your Personal Data.

Cookies may collect a unique identifier and store user Personal Data such as IP addresses, navigational data, server Personal Data, data transfer times, user preferences, and Personal Data including username and password you provide for a user account you establish.

To manage your privacy preferences, you may configure your Internet browser using the “Help” function in order to alert you when a cookie is sent or used and allow you the option to accept, reject or remove cookies. You can, in general, manage interest-based advertising or completely opt-out by indicating your choice in [www.aboutads.info/choices](http://www.aboutads.info/choices). If you reject, disable or remove cookies, you might not be able to access certain pages or important functions on the Site. You may review OneSpan’s [Cookie Policy](#) describing OneSpan’s use of cookies in more detail.

Remarketing tags such as a pixel tag or a clear GIF, and universal website tag are snippets of code that OneSpan adds on certain pages of the Site. A tag is a “web beacon” that appears as a clear graphic image of a 1x1 pixel delivered through a web browser or an HTML compliant e-mail client application to a user’s device. OneSpan uses these remarketing tags together with cookies to reach previous Site visitors for marketing activities.

Use of data collected with cookies and remarketing tags is governed by this Statement as to OneSpan’s use, and by the respective service providers’ privacy policies as to their data use.

Locally shared objects, also called “flash cookies,” are pieces of data that websites using Adobe Flash may store on your computer. OneSpan will use the Personal Data collected to find out how you navigate the Site. You may disable this function by referring to [www.adobe.com](http://www.adobe.com) for Personal Data. If you disable or disallow locally shared objects, you might not be able to access certain pages or important functions on the Site.

Internet Protocol (IP) addresses and log files are used to identify server problems, improve Site content, and compile aggregated statistics about Site usage and click-stream data. The Site also uses electronic images, known as web beacons, to help personalize your experience and perform standard Site traffic analysis in a manner similar to the use of cookies. OneSpan reserves the right to introduce new passive tracking technologies and techniques related to the use of the Site, subject to and in accordance with Applicable Data Protection Laws.

**13. THIRD-PARTY WEB ANALYTICS TOOLS**

The table below shows third-party tools and tracking technologies that OneSpan employs for marketing activities, with links to the respective Privacy Policies and Opt-out/Preferences Settings.

Tools	Purposes	Link to Privacy Policy	Link to Opt-Out and Settings Preferences
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<b>Google Ads and DoubleClick</b>	Advertising analytics and administration	<a href="http://www.google.com/policies/privacy/">http://www.google.com/policies/privacy/</a>	To adjust Google Ad Preferences: <a href="http://www.google.com/settings/ads/onweb/">http://www.google.com/settings/ads/onweb/</a> . Manage your Ad Settings by installing Google's advertising cookie Opt-out plugin: <a href="http://www.google.com/settings/ads/plugin">www.google.com/settings/ads/plugin</a>
<b>Google Analytics (including Google Universal Analytics)</b>	Analyzes web traffic across multiple devices	<a href="http://www.google.com/policies/privacy/">http://www.google.com/policies/privacy/</a> <a href="http://www.google.co.uk/intl/en/">http://www.google.co.uk/intl/en/</a>	To set your preferences or opt-out of Google Analytics: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
<b>Universal website tag of Twitter</b>	Conversion analytics involving marketing campaigns	<a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a>	To opt-out of interest-based advertising or adjust Twitter ad settings: <a href="https://support.twitter.com/articles/20170405#">https://support.twitter.com/articles/20170405#</a>
<b>Demandbase Website Platform Services by Demandbase</b>	Uses cookies and web beacons for analytics of user interactions.	<a href="https://www.demandbase.com/privacy-policy/">https://www.demandbase.com/privacy-policy/</a>	To opt-out of cookie-based advertising: <a href="http://a.company-target.com/opt-out">http://a.company-target.com/opt-out</a> To opt-out of personalized advertising delivered by other participating companies: <a href="http://www.aboutads.info/choices">www.aboutads.info/choices</a>
<b>Yahoo Gemini by Yahoo</b>	Uses web beacons and persistent cookies for digital advertising	<a href="http://info.yahoo.com/privacy">http://info.yahoo.com/privacy</a>	To adjust Yahoo Ads Settings: <a href="http://info.yahoo.com/privacy/us/yahoo/opt_out/targeting/details.html">http://info.yahoo.com/privacy/us/yahoo/opt_out/targeting/details.html</a> To opt-out of Yahoo Ads: <a href="https://aim.yahoo.com/aim/us/en/optout/index.htm">https://aim.yahoo.com/aim/us/en/optout/index.htm</a>
<b>LinkedIn Marketing Solutions by LinkedIn</b>	Deploys ads to customers.	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>	Ad preferences may be adjusted on your LinkedIn account
<b>Visual Web Optimizer by Wingify</b>	Conversion optimization services.	<a href="https://vwo.com/privacy-policy/">https://vwo.com/privacy-policy/</a>	To opt out of VWO tracking: <a href="https://vwo.com/opt-out/">https://vwo.com/opt-out/</a>
<b>Marketo Social Marketing (MSM) by Marketo</b>	Analytics involving behavioral advertising	<a href="http://www.marketo.com/trust/legal/privacy/">http://www.marketo.com/trust/legal/privacy/</a>	
<b>Marketo Munchkin Cookie by Marketo</b>	Email and marketing activity analytics	<a href="http://www.marketo.com/trust/legal/privacy/">http://www.marketo.com/trust/legal/privacy/</a>	
<b>Alexa web beacons, cookies, and pixels in Toolbar Service by Amazon</b>	Site analytics with Alexa tools	<a href="http://www.alexa.com/help/privacy">http://www.alexa.com/help/privacy</a>	You may disable the Toolbar Service on the Options Menu of your Amazon account
<b>AddThis Tools (cookies and pixels) by AddThis</b>	Collect certain Personal Data from Sites for targeted advertising	<a href="http://www.addthis.com/privacy/privacy-policy">http://www.addthis.com/privacy/privacy-policy</a>	To opt-out: <a href="http://www.addthis.com/privacy/opt-out-saved">http://www.addthis.com/privacy/opt-out-saved</a> To opt-out in US: <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a> or <a href="http://www.networkadvertising.org/choices/">http://www.networkadvertising.org/choices/</a> To opt-out in EU/EEA: <a href="http://www.youronlinechoices.eu/">http://www.youronlinechoices.eu/</a>
<b>One by AOL</b>	Use and site traffic analytics	<a href="http://privacy.aol.com/">http://privacy.aol.com/</a>	To opt-out: <a href="http://www.youronlinechoices.com/opt-out-interface">http://www.youronlinechoices.com/opt-out-interface</a>

<b>Bing Ads by Microsoft</b>	Site usage data and analytics browsers	<a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>	To adjust Microsoft ads: <a href="https://choice.microsoft.com/en-US/opt-out">https://choice.microsoft.com/en-US/opt-out</a>
<b>Google Optimize</b>	Analyzes web traffic across multiple devices and browsers	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>	To set your preferences or to opt-out: <a href="https://policies.google.com/privacy?hl=en#infochoices">https://policies.google.com/privacy?hl=en#infochoices</a>
<b>Hotjar</b>	User experience analytics	<a href="https://www.hotjar.com/legal/policies/privacy">https://www.hotjar.com/legal/policies/privacy</a>	To opt-out of Hotjar tracking: <a href="https://www.hotjar.com/legal/compliance/opt-out">https://www.hotjar.com/legal/compliance/opt-out</a>
<b>Facebook Tag API and Custom Audience Pixel</b>	Data analytics and interaction with Facebook for advertising	<a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>	To adjust Facebook ad settings: <a href="https://www.facebook.com/about/ads/">https://www.facebook.com/about/ads/</a>

Cloudflare is also used to protect the corporate website ([www.onespan.com](http://www.onespan.com)), community portal ([community.onespan.com](http://community.onespan.com)), and customer portal ([cp.onespan.com](http://cp.onespan.com)).

OneSpan and our third party service providers may gather Personal Data using passive data collection technology such as cookies, web beacons, tags, and other tools that provide OneSpan with Site activity data reflecting how you enter, navigate, and leave the pages you visit while using the Sites. Cookie Technologies are used to remember Site preferences, track device usage data, manage your activity across devices, analyze site traffic, and various other activities. Depending on the settings you have selected, your browser adds the text to your device as a small file. You can accept or decline cookies as you prefer. The Help portion of your web browser, most likely found on the toolbar, can assist you with setting or modifying your Cookie Technology settings. Note that disabling or declining cookies may prevent the use of certain features of our Sites, including the ability to login to a Site. Use of data collected with cookies and remarketing tags is governed by this Statement as to OneSpan's use of such data, and by the respective service providers' privacy policies as to their use of such data.

## 14. DATA SUBJECT RIGHTS

### Your rights as a data subject: you can access and control your personal data!

In accordance with and subject to the conditions of Applicable Data Protection Laws, we inform you that you have the following rights:

- *Right of access and inspection:* you have the right to inspect, free of charge, the Personal Data that we hold about you and to check what such Personal Data is used for.
- *Right of rectification:* you have the right to obtain rectification (correction) of your incorrect Personal Data, as well as to complete incomplete Personal Data.
- *Right of deletion or limitation:* you have the right to request us to delete or limit the processing of your Personal Data in the circumstances and under the conditions laid down by Applicable Data Protection Laws. We may refuse the deletion or restriction of any personal data which is necessary for us to fulfil a legal obligation, the performance of the contract or our legitimate interest, for as long as this Personal Data is necessary for the purposes for which it was collected.
- *Right to transferability of data:* You have the right to obtain the Personal Data you have provided to us in a structured, common and machine-readable form. You have the right to transfer these data to another data controller.
- *Right of objection:* you have the right to object to the processing of your Personal Data for serious and legitimate reasons. Please note, however, that you cannot

object to the processing of Personal Data which is necessary for us to fulfil a legal obligation, the performance of the contract or our legitimate interest, for as long as these data are necessary for the purposes for which it was collected.

- *Right of withdrawal of consent:* If the processing of Personal Data is based on prior consent, you have the right to revoke this consent. This Personal Data will then only be processed if we have another legal basis for doing so.
- *Automatic decisions and profiling:* You may object to profiling and fully automated decisions.
- *Complaints under Applicable Data Protection Laws.* You may submit a complaint to OneSpan's Data Protection Officer via [privacy@onespan.com](mailto:privacy@onespan.com)

You can exercise the aforementioned rights by contacting OneSpan via [privacy@onespan.com](mailto:privacy@onespan.com)

## **15. TECHNICAL AND ORGANIZATIONAL MEASURES**

We take steps to ensure that the Personal Data we collect under this Statement is processed in accordance with the provisions of this Statement and the requirements of applicable law wherever the Personal Data is located. We also take appropriate technical and organizational security measures to protect your Personal Data against accidental or deliberate manipulation, partial or complete loss, destruction or access by unauthorized third parties. We strive to continuously improve our security measures in line with technological developments. We endeavor to take the necessary technical and organizational measures to process your Personal Data with an adequate level of security and to protect it against destruction, loss, falsification, alteration, unauthorized access or accidental disclosure to third parties, as well as any other unauthorized processing.

The Sites use TLS (Transport Layer Security) in combination with the highest level of encryption supported by your browser.

OneSpan is also committed to reducing the risks of human error, theft, fraud and misuse of OneSpan facilities. OneSpan's efforts include making staff aware of security policies and training them to implement such policies. OneSpan employees are required to maintain data confidentiality through written confidentiality agreements, and they also receive regular training on information protection and compliance with company policies regarding the protection of confidential information.

OneSpan promptly evaluates and responds to incidents that cause suspicion of unauthorized processing of Personal Data. If OneSpan determines that your Personal Data has been misused (including by an OneSpan employee) or otherwise wrongfully obtained by a third party, OneSpan will report such misuse or data breach to you within the time limits set by Applicable Data Protection Laws.

Under no circumstances shall OneSpan be held liable for any direct or indirect damage resulting from the incorrect or unlawful use of personal data by a third party.

## **16. DATA PROTECTION FRAMEWORK**

All information about collection and processing of personal data, personal data sharing, your rights to access your Personal Data and your right to send us inquiries or to file complaints are provided for in this Statement, the Product Privacy Statement, the

Global Biometrics Privacy Notice, the Chatbot Privacy Notice and the Talent Acquisition Privacy Statement.

OneSpan is liable for all data transfers and data sharing with third parties as per the conditions of the DPF.

For the application of the DPF, OneSpan is subject to the investigatory and enforcement powers of the FTC, the DOT or any other U.S. authorized statutory body.

## **17. CONTACTING ONESPAN**

We strive to handle your Personal Data in a careful and legitimate manner in accordance with the applicable regulations. Nevertheless, if you believe that your rights have been violated and if you do not find an answer to your concerns with OneSpan and you are protected under the GDPR or the DPF, you are free to contact the Belgian Data Protection Authority:

Drukpersstraat 35, 1000 Brussels

Tel. 02 274 48 00

Fax. 02 274 48 35

E-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)

Another appropriate supervisory authority may be competent to handle a complaint regarding a purported violation of a GDPR provision by OneSpan if the subject matter relates solely to a OneSpan entity in that member state or substantially affects data subjects only in that member state.

If you believe that Personal Data has been used in a way inconsistent with this Statement, or if you have further questions, comments or suggestions related to OneSpan's handling of Personal Data, please contact OneSpan by emailing [privacy@onespan.com](mailto:privacy@onespan.com).

Written inquiries may be addressed to:

OneSpan North America, Inc.

Legal Department

121 West Wacker, Ste 2050

Chicago, IL 60601

For Data Subjects located in the EU/EEA, written inquiries to the OneSpan EU Data Protection Officer may be emailed to [Privacy@onespan.com](mailto:Privacy@onespan.com) or addressed to:

Data Protection Officer

OneSpan NV

Romeinsesteenweg 564 C

Strombeek-Bever, 1853, Belgium

This Statement was last updated in September 2023.